

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

MARIA JOSE PIZARRO,

Plaintiff,

-against-

EUROS EL TINA RESTAURANT LOUNGE and
BILLIARDS CORP., SANTIAGO QUEZADA,
and SANTIAGO QUEZADA, Jr.,

Defendant(s).

Index No.: **1:20-CV-05783-AKH**

NOTICE OF MOTION

PLEASE TAKE NOTICE, that upon the annexed Declaration of Martin E. Restituyo, together with all the exhibits annexed hereto, and Memorandum of Law, and upon all of the pleadings and proceedings heretofore had herein, defendants, Euros El Tina Restaurant Lounge and Billiards Corp., Santiago Quezada and Santiago Quezada, Jr. will move this Court, before the Honorable Alvin K. Hellerstein, District Judge of the United States District Court for the Southern District of New York located in Courtroom 14D of the Courthouse at 500 Pearl Street, New York, New York 1007-1312, for an Order pursuant to Rules 50(b) and 59(a)(1)(A) of the Federal Rules of Civil Procedure setting aside the jury very verdict and entering its own verdict, dismissing plaintiff's claims against the remaining defendants, or granting a new trial and for such other and further relief as this Court may deem just and proper.

Dated: New York, New York
November 22, 2023



By: Martin E. Restituyo, Esq.
Law Offices of Martin E. Restituyo
1325 Avenue of the Americas, 28th Floor
New York, NY 10019
restituyo@restituyolaw.com
Telephone: (212) 729-7900
Facsimile: (212) 729-7490

Attorney for Defendants

To:

Evan Craig Brustein, Esq.
Brustein Law, PLLC
299 Broadway, Ste. 17th Floor
New York, NY 10007
Telephone: (212) 333-3900
Facsimile: (212) 285-0531
Email: evan@brusteinlaw.com

Mark Ashton Marino, Esq.
Mark A. Marino, PC
380 Lexington Ave., 17th Floor
New York, NY 10168
Telephone: (212) 748-9552
Facsimile: (212) 375-8119
Email: mmarino@marino-law.com

Attorneys for Plaintiff